

United States Government

Department of Energy
Bonneville Power Administration

memorandum

DATE May 29, 2002

REPLY TO
ATTN OF: KEPR/Covington

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS
(DOE/EIS-0285/SA-69)

TO: Don Atkinson - TFN/Snohomish
Bill Erickson - TFP/Walla Walla

Proposed Action: Vegetation Management along the Rocky Reach – Maple Valley No. 1 Transmission Line ROW from structure 89/2 to structure 98/1. The transmission line is a 500 kV line.

Location: The ROW is located King County, WA.

Proposed by: Snohomish Regional Headquarters, Bonneville Power Administration (BPA).

Description of the Proposed Action: BPA proposes to clear targeted vegetation along access roads and around tower structures that may impede the operation and maintenance of the subject transmission line. BPA plans to conduct vegetation management along existing access road and around structure landings for the purpose of maintaining access to structures site. All work will be in accordance with the National Electrical Safety Code and BPA standards.

Analysis: This project meets the standards and guidelines for the Transmission System Vegetation Management Program Final Environmental Impact Statement (FEIS) and Record of Decision (ROD).

Planning Steps

1. Identify facility and the vegetation management need.

The work involved will be to clear tall growing vegetation that currently limits access to the transmission line ROW and structures.

- Control all tree and brush species except grasses within 30 feet of the transmission structures.
- Control all vegetation except grasses, to enable safe access to the transmission ROW and structure sites. The access road is to be 14 to 25 feet wide with a 15-foot high clearance.

All work will be accomplished by using hand cutting or mechanical means, treating the stumps and stubble with herbicide by using spot, localized or broadcast methods. Desirable low-growing plants will not be disturbed. The work will provide system reliability.

The vegetation control is designed to provide a 3-8 year maintenance free interval. The overall vegetation management scheme will initially include selective removal and treatment of tall growing species utilizing cut and stump treat methods using practically non toxic to slightly toxic herbicides as outlined in the attached checklist.

Subsequent work will be needed the following growing season as a follow-up to treat misses and any other re-growth.

Future cycles - As tall growing species are controlled, 5-8 year entry treatments will be needed.

2. Identify surrounding land use and landowners/managers.

The subject corridor traverses forested lands both state and privately owned. All landowners will be notified of the upcoming project by letters, personal contact and door hangers.

3. Identify natural resources.

All natural resources, e.g. riparian areas, streams and wetlands, water supply systems, landowner agreements have been identified. See section 3 of the attached checklist. The herbicides used for vegetation management will be consistent with the Vegetation Management FEIS.

A review of BPA database shows suitable Marbled Murrelet and Spotted Owl habitats are located both within BPA right-of-way and south of the transmission line in miles 89 to 93, 97 and 98. All project work located in or within a quarter mile of these areas are to apply appropriate mitigation measures.

4. Determine vegetation control and debris disposal methods.

Herbicides used are to be applied by licensed applicators following manufacturers' label instructions and BPA's management prescriptions. Herbicides used are to be consistent with the guidance outlined in the Vegetation Management FEIS.

Debris will be disposed by:

Lop and Scatter - (Branches of a fallen tree are cut off (lopped) by ax or chainsaw, so the tree trunk lies flat on the ground. The trunks are occasionally cut in 1-to-2-m (4-to-8-ft.) lengths. The cut branches and trunks are then scattered on the ground, laid flat, and left to decompose.

5. Determine re-vegetation methods, if necessary.

Re-seeding will occur only along those places where soil disturbance has occurred.

6. Determine monitoring needs.

An inspector will monitor the work being performed at the time of the initial work. Follow-up inspections will be performed during routine regular patrols. Additional required work would be identified at that time.

7. Prepare appropriate environmental documentation.

This Supplement Analysis finds that 1) the proposed actions are substantially consistent with the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285) and ROD, and; 2) there are no new circumstances or information relevant to environmental concerns and bearing on the proposed actions or their impacts. Therefore, no further NEPA documentation is required.

/s/ Mark A. Martin

Mark A. Martin
Environmental Protection Specialist

CONCUR /s/ Thomas C. McKinney

Thomas C. McKinney
NEPA Compliance Officer

DATE: 06/12/2002

Attachments

cc:

L. Croff – KEC-4
T. McKinney - -KEC-4
P. Key – LC-7
J. Meyer – KEP-4
M. Hermeston – KEP-4
J. Sharpe – KEPR-4
M. Martin – KEPR-Covington
M. Johnson – TF/DOB-1
S. Davis – TFN/Snohomish
L. Alvarez – TFN/Snohomish
C. Pursiful – TFNK/Covington
Environmental File – KEC
Official File – KEP-4 (EQ-14)

Vegetation Management Checklist

1. IDENTIFY FACILITY AND THE VEGETATION MANAGEMENT NEED

1.1 Describe Right-of-way. Rocky Reach-Maple Valley 89/2 to 98/1- Access Road Vegetation Management. Private and State lands only

Corridor Name	Corridor Length & kV	Easement width	Miles of Treatment
Rocky Reach-Maple Valley	9 miles	150	35 acres potential Access Roads

See Handbook— List of Right-of-way Components for checkboxes and the requirements for the components Rights-of-way, Access Roads, Switch Platforms, Danger Trees, and Microwave Beam paths.

Access roads and Tower sites will be treated using selective and non-selective methods that include, hand cutting, mowing, and herbicide spot, localized and broadcast applications including cut stubble and localized granular treatments. Critical habitat area (Marbled Murrelet and Spotted owl) will be treated using hand cutting and mowing methods.

The approximate acre of Right-of-way roads is 35 acres. The landowners are currently managing a large percentage of the roads so the actual need for road treatment should be less than the total acres.

The Inspector will make the actual determination for road treatment by flagging or staking of those roads during the time of contract implementation. The Contractor will provide vegetation management on roads where the vegetation is encroaching on the access road. Payment will be based the total acres treated determined by the length of treatment area, times 25 feet wide, divided by 43,560.

Right Of Way:

Transmission Structures – clearing around

Access Road clearing - approximate miles – up to 35 miles

Tower Clearing

Control all tree and brush species within about 30 ft. of transmission structures. Cut stumps are not to be taller than 2 – 4 in.

Pull all debris and slash out of the 30-ft. area around transmission structures.

Access roads Requirements:

Control all vegetation except grasses, to enable safe driving. The access road is to be 14 to 25 ft. wide with a 15-ft.- high clearance. Limbs should not hang down into the access road.

Cut stumps are not to be taller than 2 – 4 in. in the roadbed.

Cut stumps horizontal to the ground to prevent personal injuries and tire puncture.

Trim limbs back as flush to the trunk as possible when trees are rooted outside of the access road.

Pull all debris back from the access road as prescribed.

1.2 Describe the vegetation needing management.

See handbook — List of Vegetation Types, Density, Noxious Weeds for checkboxes and requirements.

Vegetation Types:

Douglas Fir

True Fir

Alder

Maple

Poplar

High (250 + stems/per acre)

1.3 List measures you will take to help promote low-growing plant communities. If promoting low-growing plants is not appropriate for this project, explain why. See

Handbook — for requirements and checkboxes.

Not Promoting Low Growing Plant Communities Describe Why? Project only entail the clearing of roads and Tower site to facilitate maintenance

1.4 Describe overall management scheme/schedule.

See Handbook - Overall Management Scheme/Schedule.

Description of the Proposed Action: BPA proposes to clear unwanted vegetation in the access roads and around tower structures that may impede the operation and maintenance of the subject transmission line. All work will be in accordance with the National Electrical Safety Code and BPA standards. BPA plans to conduct vegetation control with the goal of removing growing vegetation that is currently encumbering access to the transmission line.

The work will provide system reliability.

Initial entry –

Using hand cutting or mechanical means, BPA will complete brush management on the access roads and towers. Vegetation is currently encumbering the access roads and towers of the power lines; treat the associated stumps and stubble with herbicides (spot, localized, and broadcast treatments) to ensure that the roots are killed preventing new sprouts and selectively eliminating vegetation that prevents access to the power lines on authorized areas only. Areas may be replanted or reseeded with low-growing grasses if there is limited vegetation to re-establish the site.

Keeping trucks and equipment on designated access roads will not disturb desirable low-growing plants on the ROW. All work will take place in existing access roads or ROW.

Slash and debris will be pulled at least 10 feet from the road surface and loped and scattered, or it will be mulched mechanically

Subsequent entry

The vegetation management program will be designed to provide a 3-8 year maintenance free interval. The overall vegetation management scheme will be to initially clear and remove all encumbering vegetation using a combination of manual, mechanical, and herbicide treatments as outlined in the initial treatment

Future cycles

Future cycles of work will involve cut stump, basal treatments, or tree cutting. During routine patrols, the ROW will be examined for edge, tall growing trees, and danger trees with appropriate actions taken.

2. IDENTIFY SURROUNDING LAND USE AND LANDOWNERS/MANAGERS

2.1 List the types of landowners and land uses along your corridor.

See Handbook — Landowners/Managers/Uses for requirements, and List of Landowners/Managers/Uses for a checkbox list.

Residential

Industrial Forest lands

State/City/County Lands State Department Of Natural Resources,

Describe method for notifying right-of-way landowners and requesting information (i.e., door hanger, letter, phone call, e-mail, and/or meeting). Develop landowner mail list, if appropriate. See Handbook — Methods for Notification and Requesting Information for requirements.

The Contractor or BPA inspector will contact landowners before work begins. In addition, homes within 200 feet of the ROW will be contacted 2 days prior to treatments.

2.2 List the specific land owner/land use measures — determined from the handbook or through your consultations with the entities — that will be applied.

See handbook — Requirements and Guidance for Various Landowners/Uses for requirements and guidance, also Residential/Commercial, Agricultural, Tribal Reservations, FS-managed lands, BLM –managed lands, Other federal lands, State/ Local Lands.

When facilities that cross-state or local agency lands, notify, and cooperate with those entities) prior to vegetation control activities, as appropriate.

Treatment Details			74/5+838		On ROW Access			Off ROW Access		
TWR	To	TWR	Owner	Constraint	length	width	Ac	length	width	Ac
94/2+331		94/3+210	DNR	CREEK	1400	25	0.8		25	0.0
							23.4			30.3

2.3 Review any existing landowner agreements (e.g. tree/brush Permits or Agreements). List in table above any provisions that need to be followed and where they are located.

See handbook — Landowner Agreements for requirements.

The following landowners have responsibility for vegetation maintenance.

None Known

2.4 List any known casual informal use of the right-of-way by non-owner publics. List any constraints or measure’s to take due to the informal use.

See handbook — Casual Informal Use of Right-of-way for requirements.

Hiking, Ski Area.

2.5 List other potentially affected people, agencies, or tribes (that are not landowners/managers) that need to be notified or coordinated with. Describe method of notification and coordination.

See handbook — Other Potentially Affected Publics for requirements and suggestions.

No Tribal land involved

3. IDENTIFY NATURAL RESOURCES

See Handbook — Natural Resources

3.1 List any water resources (streams, rivers, lakes, wetlands) that may be impacted by vegetation control activities. For each water body describe the control methods and requirements or mitigation measures that will be used.

See Handbook — Water Resources for requirements for working near water resources including buffer zones.

Treatment Details		74/5+838		On ROW Access			Off ROW Access				
TWR	To	TWR	Owner	Constraint	length	width	Ac	length	width	Ac	Prescrip
89/2		89/3	PVT	CREEK		25	0.0	6846	25	3.9	Rockdale C
89/4+1150		89/5	PVT	CREEK	800	25	0.5		25	0.0	Rockdale C
90/2+881		90/3	PVT	STEEP	250	25	0.1	750	25	0.4	
90/4		90/5+543	PVT	CREEK	1800	25	1.0	940	25	0.5	Olallie Cr
94/2+331		94/3+210	DNR	CREEK	1400	25	0.8		25	0.0	
97/1+1624		97/2+1441	PVT	CREEK	200	25	0.1	1400	25	0.8	Alice Cr 97/2
97/4+31		98/1	PVT	CREEK	1400	25	0.8	4355	25	2.5	Wood Cr
							26.4			43.0	

Streams and Wetlands PVT and State Lands

State Forest or private lands, within 30.5 m (100 ft.) of a stream and wetland areas. Available: all manual and biological treatments

Manual: Hand tools and chainsaws

Mechanical: None, within 50 feet of streams or wetlands. Only on Access Roads and Tower sites. No ground disturbing activities that will cause bare soil or erosion within 100 feet from the stream.

Herbicide: Use appropriate buffers as described in the buffer table.

Suggested herbicides: Glyphosate (such as Rodeo®), Garlon 3A, dicamba (Trooper/Vanquish), Escort, clopyralid, picloram, and 2-4-d using wick and spot-foliar treatments (localized) and ground broadcast treatments with handgun only. Garlon 4 can be use when using appropriate buffers. Use only Herbicides labeled for wetland areas when treating wetlands. Do not use picloram in sensitive area or in wetlands. At no time will there be applications to standing or open water.

Streams and Wetlands M. Murrelet

US Forest lands, within 30.5 m (100 ft.) of a stream and wetland areas. Available: all manual and biological treatments

Manual: Hand tools and chainsaws

Mechanical: None, within 50 feet of streams or wetlands. Only on Access Roads and Tower sites. No ground disturbing activities that will cause bare soil or erosion within 100 feet from the stream.

Herbicide: None.

BPA BUFFER HERBICIDE

HERBICIDE	Ground water Advisory	Surface Water Advisory	Highest Aquatic Toxicity Invertebrates/Vertebrates	Spot treat	Localized	Ground Broadcast
Transline Clopyralid	x		Practically Non Toxic	25 ft	35 ft	100 ft
2,4-d Dimethyl amine Salt	x		Practically Non Toxic	25 ft	35 ft	100 ft
Glypro/Accord Glyphosate			Practically Non Toxic	Up to edge	Up to edge	35 ft

2,4-d Dodecyl/amine salt	x		Slightly toxic	25 ft	35 ft	100 ft
Tordon 22K picloram	x	x	Moderately Toxic	25 ft	35 ft	100 ft
Vanquish dicamba	x	x	Slightly Toxic	25 ft	35 ft	100 ft
Escort			Practically Non Toxic	Up to edge	Up to edge	35 ft
Garlon 3A			Practically Non Toxic	Up to edge	Up to edge	35 ft
Garlon 4*			Highly Toxic	35 ft	100 ft	400 ft

3.2 If planning to use herbicides, list locations of any known irrigation source, wells, or springs (landowners maybe able to provide this info if requested).

See Handbook — Herbicide Use Near Irrigation, Wells or Springs for buffers and herbicide restrictions.

ROARING CREEK DEVELOPMENT

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Table III-2: Herbicide-free Zones for Rights-of-way, Electric Yards, and Non-electric Facilities

Zone	Buffer Width
Agricultural Irrigation Source of Any Kind (Wet or Dry)	15m (50 ft.) from each bank (linear) or well (radius) for any herbicide.
Domestic/Public Drinking Water Well	50m (164 ft.) radius for any herbicide having a ground/surface water advisory* 15m (50 ft.) radius for any other herbicide
Domestic/Public Drinking Water Intakes/Spring Developments	For slopes <10% 50-m (164- ft.) radius for any herbicide having a ground/surface water advisory* 15-m (50-ft.) radius for any other herbicide For Slopes >10% <30% 150-m (492-ft.) radius for any herbicide having a ground/surface water advisory* 50-m (164-ft.) radius for any other herbicide For slopes >30% 300-m (984-ft.) radius for any herbicide having a ground/surface water advisory* 100-m (328-ft.) radius for any other herbicide
Sole Source Aquifers	As per local aquifer management plan.

*As stated on the label

The buffers in this table are to be used unless other agencies, local authorities, or T&E consultations require more strict buffers. In cases of more strict local buffers, those would apply. See table 7a for general aquatic toxicities of and label advisories of the active ingredients.

NON-HERBICIDE AREAS

Water sources and wells, parks, and other sensitive lands within 100 feet of Very sensitive Riparian areas or water sources. Hand Cutting Methods only, no Herbicides allowed.

WELLS: No herbicides allowed within 100 feet of wellhead. Use only herbicides that do not have ground or surface water advisories between 100 and 165 feet of wellhead. Approved herbicides include: glyphosate, Imazapyr, triclopyr, Escort,

3.3 List below the areas that have Threatened or Endangered Plant or Animal Species and the name of the species, and any special measures that need to be taken due to their presence. Attach any BAs, T&E maps, or letters from US Fish and Wildlife.

Rocky Reach Maple Valley #1 Road Project

Treatment Details		74/5+838		On ROW Access			Off ROW Access					
TWR	To	TWR	Owner	Constraint	length	width	Ac	length	width	Ac		
89/4+1150		89/5	PVT	CREEK	800	25	0.5		25	0.0	M. MURRELET	S. OWL
89/5		89/5+401	PVT	NONE	350	25	0.2		25	0.0	M. MURRELET	S. OWL
90/2+881		90/3	PVT	STEEP	250	25	0.1	750	25	0.4	M. MURRELET	S. OWL
90/3		90/4	PVT	HWY		25	0.0		25	0.0	M. MURRELET	S. OWL
90/4		90/5+543	PVT	CREEK	1800	25	1.0	940	25	0.5	M. MURRELET	S. OWL
97/1+1624		97/2+1441	PVT	CREEK	200	25	0.1	1400	25	0.8	M. MURRELET	S. OWL
97/4+31		98/1	PVT	CREEK	1400	25	0.8	4355	25	2.5	M. MURRELET	S. OWL
98/1		98/1+800	PVT	NONE	800	25	0.5		25	0.0	M. MURRELET	S. OWL

Span		T&E Species	Method/mitigation or avoidance measures
To	From		
89/4 +1150 97/1	93/1 98/1	Marbled Murrelet	<p>If a tree needing removal is greater than 80 cm (32 in.) in diameter at breast height and has suitable nest tree characteristics, initiate formal consultation with the USFWS.</p> <p>During core breeding season, from April 1- August 5, do not carry out maintenance activities (e.g., chainsaw work) that produce noise above ambient noise levels, within 0.4 km (0.25 mi.) of known marbled murrelet habitat or occupancy (based on marbled murrelet maps).</p> <p>During the late breeding season, from August 6 - September 15, do not carry out maintenance activities using motorized equipment within 0.4 km (0.25 mi.) of marbled murrelet habitat or occupancy within two hours after sunrise or within two hours before sunset.</p> <p>If planning herbicide use in marbled murrelet habitat, further consultation with US Fish & Wildlife is required.</p> <p><u>(NO HERBICIDE USE)</u></p>
89/4 +1150 97/1	93/1 98/1	Spotted owl	<ul style="list-style-type: none"> ▪ Where opportunity exists, suspend vegetation management activities within 0.4 km (0.25 mi.) of spotted owl critical habitat between March 1 and June 30, unless the owls are shown not to be nesting. For Future entries, ▪ Examine any large danger trees (11” diameter at breast height) that need to be removed in spotted-owl habitat for evidence of owls. If a tree has evidence of owl nesting activity, conduct formal consultation with the USFWS. ▪ In case of an emergency danger tree removal—a tree suddenly becoming an imminent threat to the line, posing a danger to life and property—immediately examine the felled tree for evidence of owl nesting. If such evidence is found, start emergency consultation with the USFWS, or, if the situation occurs during off-duty hours, conduct after-the-fact emergency consultation the next business day.

See Handbook — **T&E Plant or Animal Species** for requirements and determining presence.

3.4 List any other measures to be taken for enhancing wildlife habitat or protecting species.

See Handbook — Protecting Other Species for requirements.

See above

3.5 List any visually sensitive areas and the measures to be taken at these areas.

See Handbook — Visual Sensitive Areas for requirements.

N/A

3.6 List areas with cultural resources and the measures to be taken in those areas.

See Handbook – Cultural Resources for requirements.

Soil will not be disturbed. Work is confined to existing access roads and tower sites.

3.7 List areas with steep slopes or potential erosion areas and the measure and methods to be applied in those areas.

See Handbook – Steep/Unstable Slopes for requirements.

Treatment Details			74/5+838		On ROW Access			Off ROW Access		
TWR	To	TWR	Owner	Constraint	length	width	Ac	length	width	Ac
89/1+34		89/2	PVT	STEEP	700	25	0.4		25	0.0
89/3		89/4+1150	PVT	STEEP		25	0.0		25	0.0
90/2+881		90/3	PVT	STEEP	250	25	0.1	750	25	0.4
							2.8			6.4

STEEP SLOPES PVT AND STATE LANDS

Manual: Hand tools and chainsaws

Mechanical: Can be used on roads and towers. No ground disturbing activities on steep slopes.

HERBICIDE: GLYPHOSATE, PICLORAM, IMAZAPYR, 2,4-D, TRICLOPYR (GARLON 3A AND GARLON 4), DICAMBA MAY BE PRESCRIBED FOR CUT-STUMP, STEM-INJECTION, AND BASAL-STEM TREATMENTS, AS WELL AS FOR SPOT-FOLIAR, CUT STUBBLE, AND GROUND BROADCAST-FOLIAR TREATMENTS. IN ADDITION, ESCORT AND CLOPYRALID CAN BE USED FOR SPOT FOLIAR AND BROADCAST

TREATMENTS. STEEP SLOPES W/M. MURRELT

Manual: Hand tools and chainsaws

Mechanical: Can be used on roads and towers, No Ground disturbing activities on steep slopes

Herbicide: None

3.8 List areas of spanned canyons and the type of cutting needed.

See Handbook – Spanned Canyons for requirements.

N/A

4. DETERMINE VEGETATION CONTROL METHODS

See Handbook — Methods

4.1 List Methods that will be used in areas not previously addressed in steps above.

See Handbook — Manual, Mechanical, Biological, and Herbicides for requirements for each of the methods.

NONE PRESENT

5. DETERMINE DEBRIS DISPOSAL AND REVEGETATION

5.1 Describe the debris disposal methods to be used and any special considerations.

See Handbook — Debris disposal for a checkbox list and requirements.

Chip (Mechanical brush disposal unit cuts brush into chips 4 in. or less in diameter, and spread over ROW, piled on ROW, or trucked off site. Trunks too large for the chipper are limbed and the limbs chipped. Trunks are placed in rows along the edge of the right-of-way or scattered, as the situation requires.)

- Lop and Scatter (Branches of a fallen tree are cut off (lopped) by ax or chainsaw, so the tree trunk lies flat on the ground. The trunks are occasionally cut in 1-to-2-m (4-to-8-ft.) lengths. The cut branches and trunks are then scattered on the ground, laid flat, and left to decompose.)
- Mulch (Mulching is a debris treatment that falls between chipping and lop-and-scatter. The debris is cut into 1-to-2-ft. lengths, scattered on the right-of-way and left to decompose. This method is used when terrain and conditions do not allow the use of mechanical chipping equipment.)
- Other – Pull debris back 10 feet from road surface

5.2 List areas of reseeding or replanting (those areas not already described in steps 1, 2, or 3).

See Handbook — Reseeding/replanting for requirements.

If Re-Seeding is needed Mixtures of the following grasses would be beneficial

Native

California Brome (Bromus carinatus)	y
Sheep fescue (Festuca ovina)	y
Blue wildrye (Elymus glaucus)	y
Canada bluegrass (Poa compressa)	y
Smooth Brome	n
Perennial Ryegrass	n
Big Bluegrass	y
Clovers	n
Alfalfa	n
Sickle-keeled lupine 5 oz./100# seed	y
And/or Lupinus bicolor 5 oz./100# seed	y
America vetch (Vicia Americana)	y

5.3 If not using native seed/plants, describe why.

Native will be considered in all mixes. Introduced species are more competitive against invading tall tree species

5.4 Describe timing and any follow-up that will need to take place to ensure germination/success of seeding/planting.

Seeding should be completed when there is enough moisture to allow for 2 months of growth. Seeding can be completed any time of the year except for the hot summer months.

6. DETERMINE MONITORING NEEDS

See handbook — Monitoring for requirements.

6.1 Describe the follow-up/monitoring cycle that will be used to evaluate the effectiveness of the vegetation control methods used.

Site will be inspected during treatment. In addition routine patrols by BPA ground and aerial patrols

6.2 Describe any follow-up or monitoring needed to determine if mitigation measures were effective.

Routine patrols by BPA ground and aerial patrols

7. PREPARE APPROPRIATE ENVIRONMENTAL DOCUMENTATION

See handbook — Prepare Appropriate Environmental Documentation for requirements.

7.1 Describe any potential project impacts or project work that are different than those disclosed in the Transmission System Vegetation Management Program EIS. Describe how those differences impact natural resources and if the differences are “substantial”.

No

7.2 Is there a need for additional NEPA documentation (i.e. Forest Service requirement, Record of Decision, supplemental EIS)? If so, attach.

No FS lands